

# Exhibit B

**Dalsen, William D.**

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**From:** Perez, Isel M. <iperez@jonesday.com>  
**Sent:** Thursday, May 2, 2019 11:48 AM  
**To:** Dalsen, William D.  
**Cc:** Papez, Matthew E.; csloane@whitecase.com; Dale, Margaret A.; Rosen, Brian S.; Levitan, Jeffrey W.; Sooknanan, Sparkle L.  
**Subject:** RE: ERS - Subpoenas  
**Attachments:** 2019.05.01 Letter to Dalsen re Bennett Subpoena.pdf; 2019.05.01 Letter to Dalsen re Jones Day Subpoena.pdf

**FilingDate:** 5/2/2019 12:04:00 PM

Counsel,

Please see attached correspondence.

Best,  
Isel

Isel M. Perez  
Associate  
**JONES DAY® - One Firm Worldwide<sup>SM</sup>**  
Brickell World Plaza  
600 Brickell Avenue, Suite 3300  
Miami, FL 33131  
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**From:** Dalsen, William D. <[wdalsen@proskauer.com](mailto:wdalsen@proskauer.com)>  
**Sent:** Friday, April 26, 2019 6:35 PM  
**To:** Papez, Matthew E. <[mpapez@jonesday.com](mailto:mpapez@jonesday.com)>; [csloane@whitecase.com](mailto:csloane@whitecase.com)  
**Cc:** Dale, Margaret A. <[mdale@proskauer.com](mailto:mdale@proskauer.com)>; [brosen@proskauer.com](mailto:brosen@proskauer.com); [JLevitan@proskauer.com](mailto:JLevitan@proskauer.com); Sooknanan, Sparkle L. <[ssooknanan@jonesday.com](mailto:ssooknanan@jonesday.com)>  
**Subject:** ERS - Subpoenas

Matt and Cheryl –

Attached please find subpoenas to Bruce Bennett, John K. Cunningham, Jones Day, and White & Case LLP served as of today's date. Thank you for agreeing to accept service of these subpoenas.

We expect the subpoenaed parties to begin their productions promptly, and to complete their productions and serve privilege logs by May 3. As you know, the subpoenaed parties have been on notice of the Oversight Board's intention to take this discovery since March 25, 2019. ECF No. 410 at 18 n.11. We confirmed our intent to take this discovery via letter on April 10, 2019. We again confirmed our intent to take this discovery during our meet/confer on April 11, 2019, during which Movants (1) refused to withdraw the Bennett and Cunningham Declarations, and (2) refused to withdraw reliance on the April 27, 2016 meeting. We again raised the issue on April 24, 2019 at the Omnibus Hearing and explained that we intended to serve the subpoenas if Movants intended to continue relying on the 2016 meeting. Having received no information that Movants would be withdrawing their reliance on that meeting, we are left with no alternative but to serve these subpoenas.

The Oversight Board reserves all of its rights with respect to (1) seeking further discovery if necessary regarding the April 2016 meeting, and (2) moving to disqualify counsel.

Thank you.

--Will

**William D. Dalsen**

Attorney at Law

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